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Attorneys for Defendant  
**JERRY NEHL BOYLAN**

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

## UNITED STATES OF AMERICA.

Plaintiff.

V.

## JERRY NEHL BOYLAN,

Defendant.

Case No. 22-cr-00482-GW

**UNOPPOSED EX PARTE  
APPLICATION TO FILE AN  
OVERSIZED BRIEF**

Defendant Jerry Nehl Boylan, by and through his attorney of record, Deputy Federal Public Defender Georgina Wakefield, hereby applies ex parte for an order accepting an oversized brief in support of defendant's motion in limine no. 1: motion to exclude unreliable expert opinion testimony about the cause and origin of the fire.

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This application is based on the attached declaration of counsel, all files and records in this case, and any further information as may be submitted to the Court.

Respectfully submitted,

**CUAUHTEMOC ORTEGA**  
**Federal Public Defender**

DATED: September 18, 2023

By /s/ *Georgina Wakefield*

GEORGINA WAKEFIELD  
GABRIELA RIVERA  
JULIA DEIXLER  
JOSHUA D. WEISS  
Deputy Federal Public Defenders  
Attorneys for JERRY NEHL BOYLAN

**DECLARATION OF COUNSEL**

I, Georgina Wakefield, declare:

1. I am an attorney with the Office of the Federal Public Defender for the Central District of California. I am licensed to practice law in the State of California and I am admitted to practice in this Court. I have been appointed to represent Jerry Nehl Boylan in this matter.

2. I have concurrently lodged with this ex parte application defendant's motion in limine no. 1: motion to exclude unreliable expert opinion testimony about the cause and origin of the fire. The brief in support of the Motion is approximately 66 pages, not counting the table of contents and table of authorities.

3. Given the complex nature of the case and the numerous legal and factual issues raised in the motion in limine, the defense could not write a comprehensive brief of less length.

3. On September 18, 2023, I contacted the assigned Assistant United States Attorneys via email to inquire about their position regarding this application to file an oversized brief. Government counsel stated that the government does not object to this application.

4. For these reasons, I am requesting that the Court grant this ex parte application and accept the oversized brief and accompanying exhibits, so that Mr. Boylan will have the benefit of the Court's consideration of all of the issues raised in his motion in limine.

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1 I declare under penalty of perjury under the laws of the United States of America that  
2 the foregoing is true and correct.

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4 Executed September 18, 2023, at Los Angeles, California.

5 By /s/ Georgina Wakefield  
6 GEORGINA WAKEFIELD

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